

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

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GENERAL INFORMATION:

Name:	Greif Industrial Packaging & Services
Address:	7425 Industrial Road, Florence, KY 41042
Date application received:	June 21, 2006
SIC/Source description:	3412, Metal Drum Manufacturing
Source ID #:	21-015-00010
Source A.I. #:	272
Activity #:	APE20050002
Permit number:	V-06-031

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major (VOC)
__Administrative	<input checked="" type="checkbox"/> Title V (HAP)
__Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☒ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☒ Area is non-attainment (list pollutants): OZONE

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM ₁₀	0.528	2.67
SO ₂	0.014	0.04
NO _x	2.282	6.1
CO	0.456	1.28
VOC	61.265	99*
Formaldehyde	0.88	0.88
Ethylene glycol ether	19.77	19.77
Propylene glycol monopropyl ether	29.18	29.18
Ethylene Glycol	3.06	3.06
Methyl alcohol	0.14	0.14

* Source-wide VOC emission limit is 99 tpy

SOURCE DESCRIPTION:

Greif operates a container manufacturing facility at Florence. The process includes spray painting booths and paint drying ovens. Currently, Greif is holding a Title V permit for this plant. The source is major for HAPs emissions and conditional major for VOC emissions.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

Greif Containers applied to the Division for the renewal of their Title V permit. The source is major for HAPs emissions and conditional major for VOC emissions. The allowable VOC emissions limit is less than 99 tons per year. Since the emission limit is proximity to the threshold, Greif shall demonstrate the following record keeping and reporting requirements:

If total VOC emissions during any twelve-month period exceed 90 tons, the permittee will begin tracking annual emissions on a *weekly basis* beginning the following calendar month. Emissions will be tracked in this manner for three consecutive months, and monthly reports shall be submitted to the Florence Regional Office. If the rolling twelve-month totals remain less than 90 tons for three consecutive months, the permittee may return to *monthly tracking and semi-annual* reporting until such time as emissions may again exceed 90 tons for a rolling twelve-month total.

APPLICABLE REGULATIONS:

The affected facilities, **EP 01** and **EP 02** are exempt from the requirements of **401 KAR 61:132**, Section 3 if the VOC content of the coating is:

1. Less than 4.3 lb/gal, excluding water or exempt solvent or both, delivered to the applicators associated with clear coat;
2. Less than 3.0 lb/gal, excluding water or exempt solvent or both, delivered to the applicators associated with color coat or first coat on untreated ferrous substrate.

40 CFR 63: Subpart M applies to the surface coating operation of Greif's steel drum manufacturing plant. The coating operation includes spraying paints, surface preparation and cleaning. Greif is classified as an existing source per this subpart. The emission limit for this affected source is no more than 2.6 lb of organic HAP emission to the atmosphere per gal of coating solids used during each 12-month compliance period.

Compliance with the emission limit shall be demonstrated by utilizing *emission rate without add-on controls option*, §63.3891(b). The demonstration shall be based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operations, the organic HAP emission rate for the coating operations is less than or equal to allowable limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.

The alternate operating scenario, *compliant material option*, §63.3891(a) is included in Section H. This option requires the permittee to demonstrate that the organic HAP content of each coating used in the coating operations is less than or equal to the emission limit of 2.6 lb organic HAP per gallon of coating solids used during 12-month compliance period, and that each thinner and/or other additive, and cleaning material used contains no organic HAP.